

1 McCormick, Barstow, Sheppard,
2 Wayte & Carruth LLP
3 Jonathan W. Carlson
Nevada Bar No. 10536
jonathan.carlson@mccormickbarstow.com
4 Frank A. Toddre, II
Nevada Bar No. 11474
frank.toddre@mccormickbarstow.com
5 Julianne M. Ference
Nevada Bar No. 16164C
julianne.ference@mccormickbarstow.com
6 8337 West Sunset Road, Suite 350
7 Las Vegas, Nevada 89113
Telephone: (702) 949-1100
8 Facsimile: (702) 949-1101
9 Attorneys for Defendant
GEICO Indemnity Company
10

11 UNITED STATES DISTRICT COURT
12
13 DISTRICT OF NEVADA

14 TANIA BLESSING-ALVARADO,

15 Plaintiff,

16 v.
17 GEICO INDEMNITY COMPANY, a Foreign
Corporation; DOES 1 through 10; and ROE
ENTITIES 1 through 10, inclusive,
18 Defendants.

19 Case No. 2:21-cv-01952-RFB-VCF

**JOINT STATUS REPORT REGARDING
MEDIATION AND LIFTING STAY**

20 Plaintiff, Tania Blessing-Alvarado (“Plaintiff”), and Defendant, GEICO Indemnity
21 Company (“GEICO”), by and through their respective counsel of record, submit the following Joint
22 Status Report:

23 1. On August 12, 2022, the Parties attended Mediation with Judge Elizabeth Gonzalez
24 (Ret.) at Advanced Resolution Mediation. While the session was productive, it became clear that
25 the Parties were further from resolution than anticipated. Although no final settlement was reached,
26 Judge Gonzalez informally extended the Mediation to allow both sides to consider new
27 information/damages obtained and disclosed following submission of mediation briefs.
28

Case No. 2:21-cv-01952-RFB-VCF

JOINT STATUS REPORT REGARDING UNSUCCESSFUL MEDIATION AND RESUMING THE
SCHEDULING ORDER

2. Judge Gonzalez met with both Parties following the formal mediation in an attempt to work towards a resolution in this matter.

3. The Parties agree that they are unable to reach a resolution at this time, and are seeking to resume discovery.

4. The parties will complete written discovery and re-notice depositions that had been set prior to the stay of litigation.

5. Out of an abundance of caution, the parties will be requesting a brief sixty day
enlargement to the present stipulated discovery plan and scheduling order that the Court ordered on
May 16, 2022 (Doc. 17).

6. Based upon the current schedule the parties would likely be hard pressed to conduct the depositions, and have time sufficient for the transcripts to get produced and reviewed by their experts within the current time frames. The parties will submit a separate proposed stipulation in compliance with LR IA 6-1 and LR 26-3 forthwith.

Dated: September 13, 2022

RICHARD HARRIS LAW FIRM

**McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP**

By /s/ Jonathan B. Lee

By /s/ Frank A. Toddre, II

Jonathan B. Lee, Esq.
Nevada Bar No. 13524
Richard Harris Law Firm
801 South 4th Street
Las Vegas, Nevada 89101
Telephone: (702) 444-4444
Facsimile: (702) 444-4455
Attorney for Plaintiff

Jonathan W. Carlson
Nevada Bar No. 10536
Frank A Toddre, II
Nevada Bar No. 11474
8337 West Sunset Road, Suite 350
Las Vegas, Nevada 89113
Tel. (702) 949-1100
Attorneys for Defendant

IT IS SO ORDERED.

Carolee

Cam Ferenbach
United States Magistrate Judge

9-19-2022

DATED _____

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of September, 2022, a true and correct copy of **JOINT STATUS REPORT REGARDING UNSUCCESSFUL MEDIATION AND RESUMING THE SCHEDULING ORDER** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By /s/ Susan Kingsbury

Susan A Kingsbury, an Employee of
McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP